

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of

Amendment of Parts 2 and 97 of
the Commission's Rules Regarding
an Allocation of the 216-220 MHz
Band for the Amateur Services

RM-7747

COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED

The American Radio Relay League, Incorporated (the League), petitioner in the captioned rule making proceeding, by counsel and pursuant to Section 1.405 of the Commission's Rules, hereby respectfully submits its comments on its June 4, 1991 Petition for Rule Making (the Petition), as per the Public Notice, Report No. 1850, released June 24, 1991. In continued support of the frequency allocation requested in its Petition, the League states as follows:

1. The League's Petition sought a secondary, non-interference allocation for the Amateur Radio Service at 216-220 MHz. This allocation would provide reaccommodation for those present and future wideband data intercity links and other point-to-point fixed amateur stations which were, in August of this year, displaced from the 220-222 MHz band as a result of the reallocation of that segment to the Land Mobile Services.

2. Since the Public Notice was issued, the Commission, at the request of Waterway Communication System, Inc. (Watercom), with the League's concurrence, extended the comment date in this proceeding, to allow additional time for Watercom to conduct an engineering analysis of the League proposal, and to coordinate any technical

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concerns that Watercom might have with the League's technical staff and consultants. This coordination effort is ongoing, and the result of that effort will undoubtedly lead to satisfactory procedures for informal coordination of amateur operation in the

significantly greater than it was prior to August of this year. There is simply no room in these areas for any new amateur wideband data communications at 222-225 MHz, and, as predicted, the development of the nationwide high-speed packet system has been severely hampered. The League reiterates its support for the requested allocation, and urges that the Commission proceed at the earliest opportunity with the issuance of a Notice of Proposed Rule Making proposing the same.

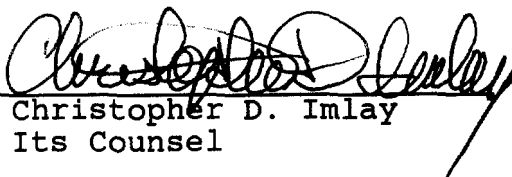
Therefore, the foregoing considered, the American Radio Relay League, Incorporated respectfully requests that the Commission issue a Notice of Proposed Rule Making at an early date proposing the allocation of the 216-220 MHz band to the Amateur Radio Service on a secondary, non-interference basis to other licensed radio services operating in that band.

225 Main Street
Newington, CT 06111

Respectfully submitted,

THE AMERICAN RADIO RELAY
LEAGUE, INCORPORATED

By


Christopher D. Imlay
Its Counsel

BOOTH, FRERET & IMLAY
1920 N Street, N. W.
Suite 150
Washington, D. C. 20036
(202) 296-9100

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